



**LPTV  
SPECTRUM  
RIGHTS  
COALITION**

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August 5, 2013

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: GN Docket No. 12-268: Expanding the Economic and Innovation Opportunities of  
Spectrum Through Incentive Auctions

Dear Ms. Dortch:

On August 5, 2013, the LPTV Spectrum Rights Coalition, representing over 550+ FCC broadcast television licenses in 31 states, submits the attached channel repack analysis of the Washington, DC DMA. This analysis assumes the following factors:

- 1) A basic version of the "51 and down plan"
- 2) A national band plan of 35x35, that is seven 5-MHz paired blocks
- 3) Channel 37 either remains as radio astronomy or becomes unlicensed space
- 4) Assumes an unlicensed block of 20-MHz
- 5) Assumes two incumbent VHF full-powers elect to convert to UHF after the repack
- 6) Assumes that a TV translator affiliated with a full power is repacked ahead of LPTV
- 7) Makes assumptions about which eligible broadcasters may volunteer for the auction
- 8) Does not take into consideration the actual OET-69 or TV Study interference issues or potential cascading adjacent market repacking effects

The Coalition makes the above assumptions with the full understanding that nothing is really in stone about any of it, and that when the final rules are approved everything could and will probably change. We present this analysis as a current best-understanding of what would happen under the above assumptions.

The conclusion is that depending on the above, there may be room in both the VHF and UHF for the 8 LPTV stations in the DC DMA, but it all depends on the number of auction volunteers.

Respectfully submitted,  
Mike Gravino, Director, LPTV Spectrum Rights Coalition